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Attorney for Jeremy John Gilbert

UNITED STATES DISTRICT COURT
Honorable Rosanna M. Peterson

United States of America,

Plaintiff,

v.

Jeremy John Gilbert,

Defendant.

No. 2:20-CR-154-RMP

Unopposed Motion to Continue

Spokane – Without Oral
Argument

March 2, 2021 at 11:00 a.m.

I. INTRODUCTION

Jeremy John Gilbert respectfully requests the Court continue the trial date, pretrial conference, and corresponding deadlines for a period of sixty (60) days.

II. BACKGROUND

On November 3, 2020, the Grand Jury returned a two-count indictment charging Mr. Gilbert with Felon in Possession of a Firearm, and Possession with Intent to Distribute 50 Grams or More of Methamphetamine.¹ Mr. Gilbert was brought into federal custody on a writ of habeas corpus ad prosequendum.² He was arraigned on January 14, 2021, and has remained in custody at the Spokane County Jail pending trial.³

The pretrial conference is set for March 2, and a jury trial is scheduled on March 15.⁴

III. DISCUSSION

Mr. Gilbert respectfully requests the Court continue this matter approximately 60 days. Additional time is necessary to investigate these allegations, review discovery, draft pretrial motions, and prepare for trial, all appropriate grounds to continue under

¹ ECF No. 1 (Indictment).

² ECF No. 7 (Writ of Habeas Corpus).

³ ECF No. 18 (Order Following Initial Appearance and Arraignment).

⁴ ECF No. 19 (Pretrial Order).

1 the Speedy Trial Act. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). Mr. Gilbert has signed a
2 speedy trial waiver.

3 Additionally, the global pandemic continues to inhibit the availability of an
4 adequate spectrum of jurors and the availability of witnesses, counsel, and court staff to
5 be present in the courtroom. *See* General Order 2021-4 (E.D. Wash. Feb. 10, 2021).
6 Based on the risks posed by COVID-19, the ends of justice are served by continuing the
7 proceedings. *See* 18 U.S.C. § 3161(h)(7)(A).

8 The Government does not object.

9 **IV. CONCLUSION**

10 For the reasons provided above, the Court should continue this case 60 days.
11

12 Dated: February 17, 2021.

13 Federal Defenders of Eastern Washington & Idaho
Attorneys for Jeremy John Gilbert

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SERVICE CERTIFICATE

I certify that on February 17, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will notify Assistant United States Attorneys: Caitlin Baunsgard.

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